

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, and MERYL MANN,

Defendants.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04390 (CGM)

NOTICE OF SUMMARY JUDGMENT MOTION FOR PREJUDGMENT INTEREST

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the
Statement of Material Facts in Support of Trustee's Summary Judgment Motion for Prejudgment

Interest, the Declaration of Nicholas J. Cremona in Support of Trustee's Summary Judgment Motion for Prejudgment Interest, with all exhibits annexed thereto, and upon all the prior pleadings and proceedings herein, Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the "Trustee"), by and through his counsel, moves this Court, before the Honorable Cecelia G. Morris, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Courthouse, One Bowling Green, New York, New York 10004, for an order granting the Trustee's summary judgment motion for prejudgment interest, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Stipulation and Order Setting Post Trial Briefing Schedule dated September 25, 2020, ECF No. 227, Defendants shall file their opposition to the Trustee's summary judgment motion for prejudgment interest on or before November 16, 2020, and the Trustee shall file his reply in further support of his summary judgment motion for prejudgment interest on or before November 30, 2020.

Dated: October 15, 2020
New York, New York

/s/ Nicholas J. Cremona

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
Nicholas J. Cremona
ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*